

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

[PROPOSED] ORDER

AND NOW, this ____ day of ____, 2022, on the Motion of Nonparty Balanced Bridge Funding LLC ("Balanced Bridge") for Temporary Restraining Order and Preliminary Injunction to Preserve Distributions to Mitnick Law Office, LLC, and any response in opposition, IT IS HEREBY ORDERED as follows:

1. The Claims Administrator shall retain any disbursements from the NFL Concussion Action to Mitnick Law Office, LLC ("Mitnick Law") unless and until the Claims Administrator determines what portion of the proposed disbursement represents legal fees payable to Mitnick Law. This may be established by provision of the engagement agreement between Mitnick Law and the subject claimant and by reference to the Court's Orders regarding attorney fees in this matter.

2. Once the Claims Administrator determines the portion of the disbursement that represents legal fees payable to Mitnick Law, it shall: (1) advise Balanced Bridge of such determination and the reasoning and basis for it; (2) release the remaining disbursement (i.e., the portion of the disbursement that does not represent legal fees) to Mitnick Law for provision to individual claimants or lienholders consistent with the Settlement Agreement; and (3) retain the legal fee portion of the disbursement until such time as the Petition to Confirm Arbitration Award in Case No. 2:21-cv-04073 is ruled upon. If the Petition to Confirm Arbitration Award

in Case No. 2:21-cv-04073 is granted, the Claims Administrator shall pay directly to Balanced Bridge the legal fees that would otherwise be payable to Mitnick Law until such time as the judgment is satisfied. The Claims Administrator shall address any further release or award of common benefit fees in the same fashion.

3. Locks Law Firm shall retain any legal fees owed to Mitnick Law for referral of clients in the NFL Concussion Litigation pending the Court's ruling of Balanced Bridge's Petition to Confirm Arbitration Award in Case No. 2:21-cv-04073. If the Court grants that Petition, Locks Law Firm shall directly pay any such fees to Balanced Bridge.

SO ORDERED:

Hon. Anita Brody